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March 25, 2019

Honorable James L. Garrity, Jr.
United States Bankruptcy Court
Southern District of New York
One Bowling Green
New York, NY 10004-1408

Re: Penny Ann Bradley, Chapter 11, Case No. 18-10122(JLG)

Hon. Judge Garrity:

This letter is written to update the Court of the status of the above-referenced Chapter 11 case.

The Debtor's last status letter was filed with the Court on February 5, 2020 [Docket No. 238].

On February 11, 2020, the Court entered a Memorandum Endorsed Order [Docket No. 241], and adjourned all outstanding matters in the case to April 1, 2020.

The Debtor has since reached an agreement with Dr. Berman, and on March 10, 2020, the Debtor filed a motion seeking approval of said agreement pursuant to Bankruptcy Rule 9019 [Docket No. 247] (the "Berman 9019 Motion").

Also on March 10, 2020, the Debtor filed a motion seeking dismissal of her Chapter 11 case pursuant to Bankruptcy Code Section 1112(b) [Docket No. 248] (the "Motion to Dismiss").

On March 24, the Court entered an additional Memorandum Endorsed Order [Docket No. 255] and adjourned all matters to April 22, 2020 at 2:00 p.m. The matters scheduled for April 22, 2020 are now as follows: (i) the Case Status Conference, (ii) the NSM Motion, (iii) the Berman 9019 Motion, (iv) the Atlas Claim Objection, (v) the Pollack Claim Objection, (vi) the UST Motion, and (vii) the Debtor's Motion to Dismiss.

The Debtor continues to negotiate in good faith to resolve all other claims. The Debtor has been in communications with the U.S. Trustee with regard to discovery relating to the UST Motion. The U.S. Trustee turned over its discovery, which the Debtor is reviewing and may possibly incorporate into a proposed discovery plan with regard to the UST Motion. The Debtor is optimistic that it will resolve some or all of the claims very shortly and will provide the Court with any further updates at, or prior to, the next Status Conference, should there be any significant progress.

The Debtor's records indicate that she is current with U.S. Trustee Quarterly fees and is fully compliant with all administrative obligations under the Bankruptcy Code, Bankruptcy Rules, Local Bankruptcy Rules, and United States Trustee Guidelines.

If the Court wishes, I will be pleased to submit any further status updates at such times as the Court may direct.

Respectfully,
/s/ Daniel S. Alter
Daniel S. Alter, Counsel for the Debtor

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